

Attachment 1
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Answer to Question 10

In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to assignor/transferor and the assignee/transferee.

63.18(c)

Assignor: Great Lakes Comnet, Inc.
1515 Turf Lane
Suite 100
East Lansing, MI 48823
Phone: 517-664-1600

Assignee: Great Lakes Comnet, Inc. -- Debtor in Possession
1515 Turf Lane
Suite 100
East Lansing, MI 48823
Phone: 517-664-1600

Section 214 Authorization Holder:

Westphalia Broadband, Inc. (subsidiary of Great Lakes Comnet, Inc.)
1515 Turf Lane
Suite 100
East Lansing, MI 48823
517-664-1600

Copies of all correspondence, notices, and inquiries should also be addressed to:

Michael C. Rampe
Miller, Canfield, Paddock and Stone, PLC
One Michigan Avenue
Suite 900
Lansing, MI 48933
(517) 487-2070

63.18(d)

Westphalia Broadband, Inc. holds an International Telecommunications Certification for global and/or limited global resale service, File No. ITC 214-19980710-00463.

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Answer to Question 11

Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the matter specified in the note to Section 63.18(h) of the rules?

If you answered “Yes” to this question, provide in Attachment 1, the name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent).

On January 25, 2016, Great Lakes Comnet, Inc. (“GLC”), parent company to Westphalia Broadband, Inc. (“WBI”), filed a petition for relief under Chapter 11 of the United Bankruptcy Code in the United States Bankruptcy Court for the Western District of Michigan (“Chapter 11 Filing”).¹ As a result, GLC is now operating as a debtor in possession. Consequently, no change in control of WBI has occurred.

WBI is a corporation and wholly owned subsidiary of Clinton County Telephone Company (“CCTC”), which is a subsidiary of GLC (see chart below). Thus, the following entities have a 10% or greater interest in GLC:

1. Name: Ace Telephone Association
 Interest: Parent company and 100% owner of ATC
 Address: 207 E. Cedar
 P.O. Box 360
 Houston, MN 55943
 Citizenship: Telephone cooperative headquartered in Houston, MN
 Principal Business: Provides local exchange service as an incumbent local exchange carrier (“ILEC”), long distance, broadband Internet services, video service, and a variety of other services in small towns and rural areas located in Iowa and Minnesota.

2. Name: Ace Telephone Company of Michigan, Inc. (“ATC”)
 Interest: 51.5% shareholder of GLC
 Address: 207 E. Cedar
 P.O. Box 360
 Houston, MN 55943
 Citizenship: Organized under the laws of the State of Michigan
 Principal Business: Telecommunications provider

¹ WBI itself did not file for Bankruptcy.

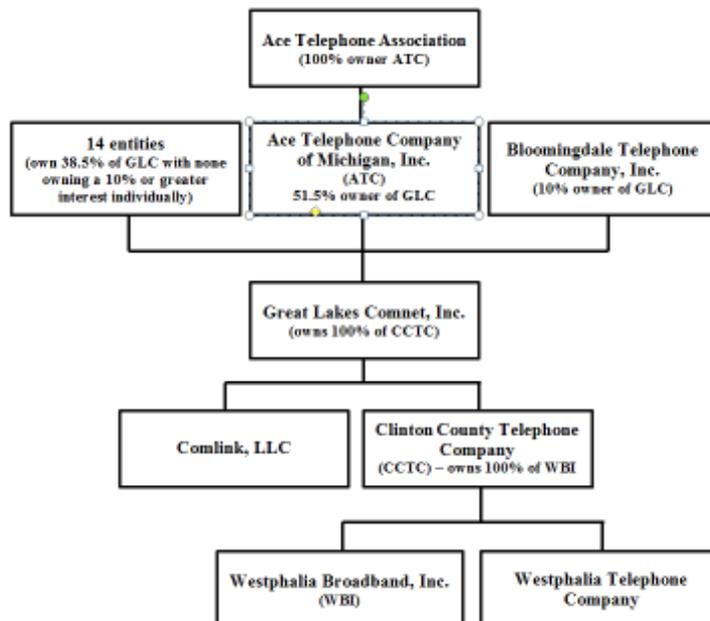
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Answer to Question 11 Continued

3. Name: Bloomingdale Telephone Company, Inc.
 Interest: 10% shareholder of GLC
 Address: 101 W. Kalamazoo Street
 Bloomingdale, MI 49026
 Citizenship: Organized under the laws of the State of Michigan
 Principal Business: Telecommunications provider

4. Name: Great Lakes Comnet, Inc.
 Interest: 100% owner of CCTC (which wholly owns WBI)
 Address: 1515 Turf Lane
 Suite 100
 East Lansing, MI 48823
 Citizenship: Organized under the laws of the State of Michigan
 Principal Business: Telecommunications provider

5. Name: Clinton County Telephone Company
 Interest: 100% owner of WBI
 Address: 1515 Turf Lane
 Suite 100
 East Lansing, MI 48823
 Citizenship: Organized under the laws of the State of Michigan
 Principal Business: Telecommunications provider



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Answer to Question 13

Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. International assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response “Answer to Question 13.”

On January 26, 2016, GLC, WBI’s parent company, filed a petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Michigan (“Chapter 11 Filing”). Because the ownership of GLC and WBI did not change as a result of the Chapter 11 Filing as reflected in the response to Question 11, WBI respectfully submits that this pro forma assignment notification complies with its obligations under the Commission’s rules.